

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**CHAPTER 13**

**YVETTE GARNETT**

**Debtor**

**BANKRUPTCY NO. 20-13108**

**DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE FOR GSAMP  
TRUST 2006-NC2, MORTGAGE  
PASS-THROUGH CERTIFICATES,  
SERIES 2006-NC2**

**Movant**

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC  
STAY FILED BY DEUTSCHE BANK NATIONAL TRUST COMPANY**

COMES NOW DEBTOR, YVETTE GARNETT, by and through her attorney, THOMAS R. SMITH, JR., and hereby submits the following responses to the numbered paragraphs in Deutsche Bank National Trust Company's ("Movant") Motion for Relief:

1. Admitted.
2. Admitted.
3. Admitted.
4. Neither admitted nor denied.
5. Neither admitted nor denied.
6. On or around August 13, 2021, Debtor sent a check to movant in the amount of \$5,300.00. Movant confirmed receipt of payment. Debtor intends to send future monthly payments to Movant pursuant to the terms of the Note and Mortgage.
7. Neither admitted nor denied. Debtor objects to the attorney's fees and costs requested by Movant.
8. Neither admitted nor denied. Debtor objects to the attorney's fees and costs requested by Movant.
9. Denied. Debtor specifically denies that Movant is entitled to relief.
10. Neither admitted nor denied. Debtor does not object to Movant communicating with Debtor's counsel.

11. Denied. Debtor specifically denies that Movant is entitled to relief.

12. Denied. Debtor specifically denies that Movant is entitled to relief.

13. Neither admitted nor denied.

WHEREFORE, Respondent respectfully requests that Movant's Motion to Relief from the Automatic Stay be denied.

FREEDMAN AND LORRY, P.C.

/s/ Thomas R. Smith, Jr.

THOMAS R. SMITH, JR., ESQ  
FREEDMAN AND LORRY, P.C.  
1601 Market Street, Suite 1550  
Philadelphia, PA 19103  
(215) 931-2554  
TSmith@freedmanlorry.com

Counsel for the Debtor

### **CERTIFICATION**

Respondent certifies, under penalty of perjury, that the matters stated herein are true and correct to the best of his knowledge, information, and belief.

DATE: September 8, 2021

ATTORNEYS FOR DEBTOR

/s/ Thomas R. Smith, Jr.

THOMAS R. SMITH, JR., ESQUIRE  
FREEDMAN AND LORRY, P.C.  
1601 Market Street, Suite 1550  
Philadelphia, PA 19103  
(215) 931-2554